

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**

*Plaintiff,*

v.

**ZTE CORPORATION, ZTE (USA) INC.  
AND ZTE (TX), INC.,**

*Defendants.*

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C.A. NO. 6:20-cv-00487-ADA  
C.A. NO. 6:20-cv-00488-ADA  
C.A. NO. 6:20-cv-00489-ADA  
C.A. NO. 6:20-cv-00490-ADA  
C.A. NO. 6:20-cv-00491-ADA  
C.A. NO. 6:20-cv-00492-ADA  
C.A. NO. 6:20-cv-00493-ADA  
C.A. NO. 6:20-cv-00494-ADA  
C.A. NO. 6:20-cv-00495-ADA  
C.A. NO. 6:20-cv-00496-ADA  
C.A. NO. 6:20-cv-00497-ADA

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**DECLARATION IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS OR IN THE  
ALTERNATIVE TO TRANSFER VENUE**

I, Lionel M. Lavenue, declare as follows:

1. I am an attorney with the law firm of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, counsel of record for Defendants ZTE (USA) Inc., ZTE (TX), Inc., and ZTE Corp (collectively “ZTE,” and “ZTA,” “ZTX,” and “ZTC,” respectively) in the above-captioned matters. I submit this declaration in support of Defendants’ Motion to Dismiss Plaintiff’s WSOU Investments LLC d/b/a Brazos Licensing and Development (“WSOU”) Amended Complaint for improper venue, or in the Alternative Transfer venue to the Northern District of Texas. I have personal knowledge of the facts set forth in this declaration, and, if called to do so, I could and would competently testify thereto.

2. Attached as Ex. A is a copy of a Bloomberg Company Profile for the “First Title Co of Waco LLC” company associated with “605 Austin Avenue Suite 6 Waco, TX 76701”. The article was captured on December 3, 2020 from “<https://www.bloomberg.com/profile/company/0857757D:US>”.

3. Attached as Ex. B is a copy of a Google Street View for the following address: River Place Corporate Park, Building I, 6500 River Place Boulevard, Austin, Texas 78730. The view was captured on December 3, 2020 from “[https://www.google.com/maps/@30.392383,-97.8486393,3a,90y,246.13h,83.45t/data=!3m7!1e1!3m5!1s93qKkZKd6XfjnirtpMLBfw!2e0!6s%2F%2Fgeo0.ggpht.com%2Fcbk%3Fpanoid%3D93qKkZKd6XfjnirtpMLBfw%26output%3Dthumbnail%26cb\\_client%3Dmaps\\_sv.tactile.gps%26thumb%3D2%26w%3D203%26h%3D100%26yaw%3D152.11304%26pitch%3D0%26thumbfov%3D100!7i16384!8i8192](https://www.google.com/maps/@30.392383,-97.8486393,3a,90y,246.13h,83.45t/data=!3m7!1e1!3m5!1s93qKkZKd6XfjnirtpMLBfw!2e0!6s%2F%2Fgeo0.ggpht.com%2Fcbk%3Fpanoid%3D93qKkZKd6XfjnirtpMLBfw%26output%3Dthumbnail%26cb_client%3Dmaps_sv.tactile.gps%26thumb%3D2%26w%3D203%26h%3D100%26yaw%3D152.11304%26pitch%3D0%26thumbfov%3D100!7i16384!8i8192)”.

4. Attached as Ex. C is a copy of a Texas Comptroller of Public Accounts Taxable Entity Search result for “WSOU Investments.” The view was captured on December 3, 2020 from “<https://mycpa.cpa.state.tx.us/coa/coaSearchBtn>”.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on December 4, 2020 at Reston, Virginia.

Dated: December 4, 2020

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

By: */s/ Lionel M. Lavenue*

Lionel M. Lavenue